

MORRISON COHEN LLP

909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Jason P. Gottlieb, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE that Jason P. Gottlieb, Esq. of Morrison Cohen LLP, hereby enters his appearance (this “**Notice of Appearance**”) in the above-captioned chapter 11 cases (“**Chapter 11 Cases**”), pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rule**”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (“**Bankruptcy Code**”), and requests that (a) the undersigned be added to the official mailing matrix and service list in this Chapter 11 Cases and (b) pursuant to Bankruptcy Rules 2002, 9007, and 9010, and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in this Chapter 11 Cases and copies of all papers served or required to be served in this Chapter 11 Cases, including but not limited to, all

¹ The debtors (“**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, plans, disclosure statements, and all other matters arising herein or in any way related to this Chapter 11 Cases, be given to and served upon the following person at the address, email address, telephone number, and facsimile number set forth below:

Jason P. Gottlieb, Esq.
MORRISON COHEN LLP
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Email: jgottlieb@morrisoncohen.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint, or demand, motion, petition, pleading, or request, and answering or reply papers filed in this Chapter 11 Cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand-delivery, telephone, telegraph, telex, or otherwise filed or made with regard to this Chapter 11 Cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit shall constitute or be construed to be a waiver of any substantive or procedural right, including, without limitation, the right to: (a) have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Judge; (b) trial by jury in any proceeding as to any and all matter so triable, whether or not such matters are designated as legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution; (c) seek abstention or remand of any matter or proceeding subject to mandatory or

discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal; (d) the rights, remedies and claims against other entities or to make an election of remedies; or (e) any other rights, claims, actions, defenses, setoffs or recoupments to which the Defendants are or may be entitled under any agreements or at law or in equity or under the United States Constitution, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved and preserved.

Dated: New York, New York
March 21, 2023

MORRISON COHEN LLP

By: /s/ Jason P. Gottlieb
Jason P. Gottlieb, Esq.
909 Third Avenue, 27th Floor
New York, New York 10022
(212) 735-8600
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